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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LYNN THOMPSON,

Plaintiff,

vs.

TESLA MOTORS, INC.; ONQGLOBAL,
INC.; DOES 1-50,

Defendants.

Case No. 3:21-cv-00238-HDM-WGC

**DEFENDANT TESLA MOTORS, INC.'S
MOTION TO EXTEND DEADLINE TO
FILE ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

(SECOND REQUEST)

Defendant TESLA MOTORS, INC., by and through its counsel, Jackson Lewis P.C., hereby brings the instant Motion to Extend the Deadline to File Answer or Otherwise Respond to Plaintiff's Complaint, by ten (10) days, up to and including Friday, October 1, 2021. This Motion is submitted and based upon the following:

1. This is the second request for an extension of time for Defendant to file its answer or otherwise respond to Plaintiff's Complaint (ECF No. 1). The parties previously entered into a stipulation extending the time for Defendant to respond to Plaintiff's Complaint. *See* ECF No. 10.

2. Currently, Defendant's response to Plaintiff's Complaint was due on Tuesday, September 21, 2021.

3. Defendant attempted to obtain Plaintiff's consent to the aforementioned request for an extension prior to the expiration of the deadline; however, Plaintiff's counsel has not yet responded. Out of an abundance of caution, Defendant now files this Motion.

4. This matter arises out of work performed by Plaintiff as an independent contractor at Defendant's facility located in Sparks, Nevada between March and June 2018. Plaintiff has

1 asserted various claims against Defendant which pertain to that relationship and which are currently
2 being litigation in an arbitration proceeding pending with JAMS and presided over by Arbitrator
3 Hon. Carl W. Hoffman (Ret.). The claims at issue in this case arise out of the same operative facts
4 and circumstances as alleged in Plaintiff's Complaint.

5 5. The parties have discussed on several occasions whether Plaintiff will agree to stay
6 this case pending completion of the arbitration proceeding. To date, Plaintiff has not indicated a
7 willingness to stay the case pending completion of arbitration, however, Plaintiff's counsel indicated
8 that the matter continues to be discussed with Plaintiff and a final decision has not been reached.

9 6. Moreover, Defense Counsel was out of the office several days last week, and both
10 parties have been otherwise engaged in multiple depositions in the arbitration proceeding.

11 7. Based on the foregoing reasons, a short additional amount of time is necessary for
12 Defendant to review the Complaint, complete its ongoing investigation and determination as to
13 defense strategy, and prepare its response to Plaintiff's Complaint.

14 8. Accordingly, Defendant respectfully requests the Court to enter an order extending
15 the time in which to answer or otherwise respond to Plaintiff's Complaint by ten (10) days, up to
16 and including **October 1, 2021**.

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